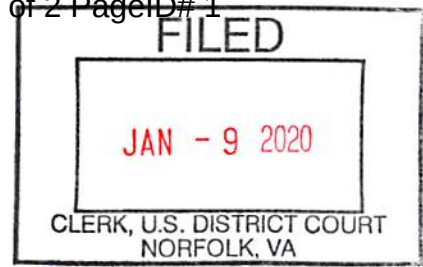


**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**



<b>IN RE:</b> <b>The Sealing of the Search Warrant</b> <b>And the Application and Affidavit</b> <b>In Support of the Search Warrant</b>	) ) ) )	<b>CASE NUMBER:</b> 4:20sw1  <b>UNDER SEAL</b>
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**MOTION TO SEAL SEARCH WARRANT**

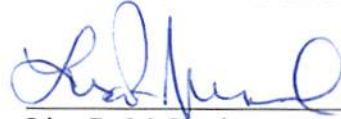
The United States of America, by and through its attorneys, G. Zachary Terwilliger, United States Attorney for the Eastern District of Virginia, and Lisa R. McKeel, Assistant United States Attorney, pursuant to Local Criminal Rule 49(B) moves to seal the search warrant and the application and affidavit in support of the search warrant in this case.

The criminal investigation in this case has just begun and is ongoing. The search location has been identified through an IP address as having uploaded child pornography. The affidavit contains the name of individuals associated with the search location address. Sealing is necessary to avoid notification of the existence of the search warrant which could result in publicly identifying subject(s) who have yet to be charged with criminal offenses or who may not be charged with criminal offenses or otherwise jeopardize the ongoing investigation. Another procedure will not adequately protect the needs of law enforcement at this time.

Such sealing is within the discretion of this Court. *In re Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989); *In re Washington Post Co. v. Hughes*, 923 F.2d 324 (4th Cir. 1991); *Media General Operations, Inc., et al. v. Buchanan*, 417 F.3d 424 (4th Cir. 2005).

The United States requests that the search warrant and the application and affidavit in support of the search warrant remain under seal until further Order of this Court except that the United States may, without further Order of this Court, provide copies of the warrant, application and affidavit as need be to personnel assisting it in the investigation and prosecution of this matter, and may disclose these materials as necessary to comply with discovery and disclosure obligations in any prosecutions related to this matter.

Respectfully submitted,  
G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY



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